

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC, 20554

In the Matter of)
Creation of a Low)
Power Radio)
Service)

MB Docket No. 99-25

1. KVLP-LP "Visalia Local Power" is an LP-100 station in Visalia, California. Its direction is provided by the board of directors of the local congregation of the Universal Life Church. Its general manager and Pastor is Jack Wm. Balsley, who is licensed as radio amateur KG6AIR.
2. KVLP is in a community sandwiched between the sweeping arcs of larger "markets" of Fresno and Bakersfield. Our voice had been lost in the corporate broadcast changes of the past decade, until KVLP went on-air.
3. The Board has reviewed the current notice under NPRM 99-25, and files the following:
4. KVLP supports a change in the rules to eliminate both the second-adjacent and the third-adjacent spacing restrictions for LPFM stations, LP-100 and LP-10.
5. KVLP supports a change in the rules to allow LP-100 applications to be accepted in any LP-10 window. If qualified, LP-100 applications would take precedence over LP-10 applications within the 26km cochannel radius.
6. KVLP supports a change in the rules to allow an LPFM board to change more than fifty percent of its membership. Many nonprofit organizations encourage the rotation of chairs and board members, especially for the leadership experience so needed and valued in small communities.
7. KVLP supports an extension of eighteen months, to a total CP time of three years, for all current valid construction permits, to allow the group to adequately redevelop both its human and financial resources. Many groups applied nearly five years ago, and the *champion* of the project may have moved on, as well as the need for financial resources to be redirected. An additional 18 months is fair in light of the Commission taking so long to process these initial LPFM window applications. KVLP also supports allowing all new CPs a total of three years to construct and get on-air.
8. KVLP supports the transfer of a CP and/or license to another qualified organization within the community, provided there is no monetary consideration. If a CP is transferred, only eighteen months should be allowed after the transfer is approved.
9. KVLP supports multiple ownership of LPFM stations, provided that any additional stations are within 40 miles of the initial station, in order to facilitate the close and continuing contact of all station's volunteers, staff, and board of directors or headquarters.
10. KVLP supports local radio broadcasting, over the invasion of out-of-state translators. Such invaders should be given secondary (or even tertiary) status, after LPFM stations. As a side note, we as a local community congregation abhor the wholesale trafficking of translator permits, such as has occurred since 2003.

Respectfully Submitted,

Rev. Jack Wm. Balsley
for KVLP-LP "Visalia Local Power"
1335 South Sowell Street
Visalia, CA 93277
KVLP @ radio . fm
www . KVLP . org